

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

GLOBALFOUNDRIES U.S. INC.,

Plaintiff,

v.

INTERNATIONAL BUSINESS
MACHINES CORPORATION,

Defendant.

Special Pro. No.: 1:24-cv-490

**DECLARATION OF KAZUNARI ISHIMARU IN SUPPORT OF
MOTION TO QUASH AND FOR PROTECTIVE ORDER**

I, Kazunari Ishimaru, declare as follows:

1. I make this declaration in support of my motion to quash the subpoena to testify at a deposition in a civil action (the “Subpoena”) dated October 30, 2024, issued by GlobalFoundries U.S., Inc. (“GlobalFoundries”) and served on me on November 4, 2024, and for a protective order pursuant to Federal Rule of Civil Procedure 26(e). Unless otherwise stated, I have personal knowledge of the facts stated in this declaration, and I would testify to them if called upon to do so. I am fluent in Japanese and conversant in English and have elected to prepare this declaration in English with the assistance of translation by counsel.

2. I am the Senior Managing Executive Officer of the Silicon Technology Division of Rapidus Corporation (“Rapidus”). Rapidus is headquartered in Tokyo, Japan.

3. I am a citizen of Japan. I reside in Yokohama, Japan. I perform my duties on behalf of Rapidus primarily from Japan.

4. I traveled to Oahu, Hawaii on November 3, 2024, and was present there until November 7, 2024. During my trip I attended the “International Trade Partners Conference,” a conference held in Oahu, Hawaii by Semi, a semiconductor industry association.

5. I was served with the Subpoena on November 4, 2024, while attending the International Trade Partners Conference.

6. I do not regularly transact business in person in Honolulu, Hawaii or within 100 miles of Honolulu, Hawaii. Over the past five years, I have traveled to Hawaii a total of two times including the November 3, 2024 – November 7, 2024 trip. Each of those trips lasted approximately 4 days each, for a total of approximately 8 days across the two trips. All of those trips were for the purpose of attending the International Trade Partners Conference 2024 or 2022 IEEE Symposium on VLSI Technology & Circuits. I have not traveled to Hawaii for any other purpose in the past five years.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: November 15, 2024
At: Tokyo, Japan

By: s/ K. Ishimaru

Kazunari Ishimaru